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Federal Defenders OF NEW YORK, INC.

Southern District 52 Duane Street-10th Floor, New York, NY 10007 Tel: (212) 417-8700 Fax: (212) 571-0392

David E. Patton Executive Director and Attorney-in-Chief Southern District of New York Jennifer L. Brown Attorney-in-Charge

August 4, 2022

VIA ECF

Honorable Ronnie Abrams United States District Court Southern District of New York 40 Foley Square New York, NY 10007

Re: United States v. Sonny Saratoga, 21 Cr. 560 (RA)

Dear Judge Abrams:

I write jointly with the government to respectfully request an adjournment *sine die* of Mr. Saratoga's trial date, currently scheduled for October 17, 2022. As the Court is aware, Mr. Saratoga is currently detained on a state court charge of Murder in the Second Degree, pending in Bronx County. That case is in the motions phase and is expected to proceed to trial. I have conferred with the government, and the parties anticipate achieving a pretrial disposition as soon as the state court matter is resolved. The parties propose filing a joint status update in approximately six months. The parties will also keep the Court apprised of the trial date in the state court matter.

The defense does not object to the exclusion of time under the Speedy Trial Act until the date that the Court sets for a status update or conference.

Application granted. The trial scheduled for October 17, 2022 is adjourned *sine die*. The parties shall provide the Court with a status updated by February 6, 2023.

SO ORDERED.

Ronnie Abrams, U.S.D.J.

August 5, 2022

Tamara L. Giwa

Respectfully submitted,

Counsel for Sonny Saratoga Federal Defenders of New York

(917) 890-9729

Cc: AUSA Ni Qian (via ECF)

AUSA Michael Herman (via ECF)